

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF**

v.

**BERNETTA LASHAY WILLIS,
DEFENDANT**

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CR. NO. 2:06-CR-0071-MEF

MOTION FOR EXTENSION OF TIME

Comes now Defendant Bernetta LaShay Willis, through counsel, and pursuant to Rule 45 (b), Federal Rules of Criminal Procedure, moves the Court to extend the time within which she has to file post-trial motions and in support thereof states as follows:

1. The undersigned was appointed to represent Defendant on post-trial matters by order of this Court dated April 12, 2007 in accordance with the Criminal Justice Act which Order was received by counsel on April 15, 2007.

2. Said Order extended the time for filing post-trial motions to May 15, 2007.

3. Counsel has filed contemporaneously herewith a Motion for Transcription of Trial Record.

4. Counsel has contacted the Court Reporter, Mitchell Reisner, and informed him of the necessity of receiving the trial transcript in time to assess issues relevant to post-trial motions and file said motions on or before May 15, 2007.

5. Mr. Reisner has indicated that he will not be able to prepare the transcript of the trial in time to meet the May 15, 2007 deadline.

6. Rule 45 (b), FRCrP, provides “[w]hen an act must be done . . . within a specified

period, the court . . . may extend the time . . .for good cause . . . on a party's motion made:
before the previously extended time expires;”

6. Counsel estimates he will need fourteen (14) days from the date he receives the transcript to adequately review the transcript and prepare whatever post-trial motions may be available to Defendant in order to protect Defendant's Constitutional rights.

Wherefore, the above matters considered, defendant prays this Court enter an order extending the time within which she has to file post-trial motions to a date fourteen (14) days after receipt of the trial transcript.

Respectfully submitted this day, April 17, 2007.

/s/Timothy C. Halstrom
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Bar Number HAL021
Attorney for Defendant Willis

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing parties and their attorneys. I further certify that I have served the foregoing upon Mr. Mitchell Reisner.

/s/Timothy C. Halstrom

Timothy C. Halstrom

Bar Number HAL021